

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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U.S. COMMODITY FUTURES TRADING
COMMISSION,

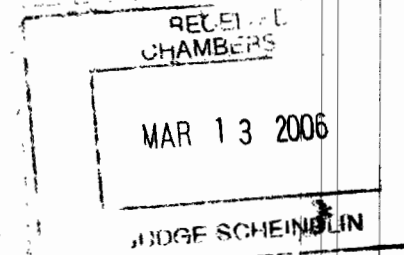
Plaintiff,

v.

RICHMOND GLOBAL ASSOCIATES, L.L.C.
et al.,

Defendants.
-----X

[Proposed] Joint Discovery Order
05 Civ. 2181 (SAS)



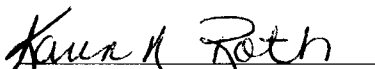
All discovery, except for expert discovery, shall be commenced in time to be completed by **December 8, 2006**. Interim deadlines set below may be extended by the parties upon consent without application to the Court, provided that the parties can still meet the discovery completion date ordered by the Court.

- A. First requests for the production of documents, if any, to be served by **April 28, 2006**.
- B. Interrogatories, if any, pursuant to Local Rule 33.3(a) of the Civil Rules of the Southern District of New York to be served by **June 2, 2006**. No other interrogatories are permitted except upon prior express permission of the Court.
- C. Depositions to be completed by **December 8, 2006**.
 - i. Unless counsel agree otherwise or the Court so orders, depositions are not to be held until all parties have responded to any first requests for the production of documents.
 - ii. Whenever possible, unless counsel agree otherwise or the Court so orders, non-party depositions shall follow party depositions.
- D. Experts' initial reports, if any, are to be exchanged by **October 13, 2006** and any rebuttal experts' reports be exchanged by **November 10, 2006**. **Experts may be deposed, but such depositions must occur within the time limits set forth for all depositions set forth above.**
- E. Requests to Admit, if any, are to be served no later than **November 3, 2006**.

- F. Dispositive motions are to be served by **January 5, 2007**. Answering papers are to be served by **February 2, 2007**. Reply papers are to be served by **March 2, 2007**. Once it is fully briefed, the motion shall be filed with the Court.
- G. The plaintiff will supply its pretrial order matters to the defendants no later than **30** days after the completion of discovery, or after the final decision of any dispositive motion, whichever is later, unless a different date is set by order of the Court.
- H. The joint pretrial order shall be filed no later than **45** days after the completion of discovery, or after the final decision of any dispositive motion, whichever is later, unless a different date is set by order of the Court. The requirements for the pretrial order and other pretrial submissions shall be governed by the Court's Individual Practice Rules.
- I. The final pretrial conference shall be set by the Court for **30** days before the scheduled trial date.

This schedule may be altered or amended only on a showing of good cause not foreseeable at the time of its submission and the Court concludes that extraordinary circumstances warrant an extension with respect to one or more than one of the scheduled dates.

SUBMITTED BY:



Karin N. Roth
David W. MacGregor
Division of Enforcement
U.S. Commodity Futures
Trading Commission
140 Broadway
New York, NY 10005
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On behalf of Plaintiff

Bennett Epstein
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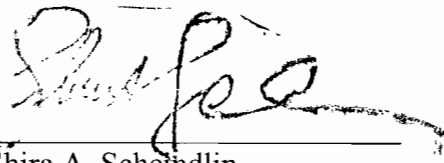
Lawrence F. Ruggiero
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Richard J. Shanley
Attorney for Ronald Turner
328 Flatbush Avenue
Brooklyn, NY 11238
(718) 789-2003

On behalf of Defendants

SO ORDERED

March 24, 2006

A handwritten signature in black ink, appearing to read 'Shira A. Scheindlin', written over a horizontal line.

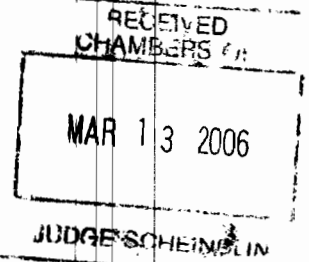
Shira A. Scheindlin
United States District Judge



Division of
Enforcement

U.S. COMMODITY FUTURES TRADING COMMISSION

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March 10, 2006

Honorable Shira A. Scheindlin
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, New York 10007

Re: *U.S. Commodity Futures Trading Commission v. Richmond Global Associates*
05 Cv 2181 (SAS)

Dear Judge Scheindlin:

The U.S. Commodity Futures Trading Commission (the "Commission"), the plaintiff in this matter, submits the attached proposed Joint Discovery Order for the Court's approval. The Commission has provided attorneys for the defendants with the Commission's proposal by e-mail and sought these attorney's comments on the proposed Joint Discovery Order. Attorneys for the defendants have not objected to the Commission's proposal.

A copy of the proposed Joint Discovery Order has been submitted to the Orders and Judgments Clerk by e-mail.

Respectfully submitted,

Karin N. Roth [KR 2669]
Ph. (646) 746-9764
Fax (646) 746-9940

Enc.:

cc: John Moscow, Esq. (Court Appointed Receiver) (w/ enc.) via first class mail
Bennett Epstein, Esq. (CJA Attorney for Miron Vinokur) (w/ enc.) via first class mail
Lawrence F. Ruggiero, Esq. (Attorney for Joseph Pappalardo) (w/ enc.) via first class mail
Richard J. Shanley, Esq. (Attorney for Ronald Turner) (w/ enc.) via first class mail
Mr. Vincenzo Danio (w/ enc.) via first class mail